

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

In re:)
)
)
THOMAS EDWARD COMMERFORD) Case No. B-14-50218 C-13W
JEAN LAKE COMMERFORD,)
)
)
Debtors.)

MOTION TO CONVERT CHAPTER 13 CASE TO A CHAPTER 7 CASE

Now comes Kathryn L. Bringle, Trustee in this Chapter 13 case, through Counsel, who respectfully moves the Court for an Order converting this case to a Chapter 7 case, and in support thereof shows the Court as follows:

1. The Debtors have defaulted in payments under the terms of the Plan.
2. There is sufficient equity in the estate to allow unsecured creditors to receive a dividend if the case is converted to Chapter 7.
3. The Trustee is of the belief the case should be converted to a case under Chapter 7 of the Bankruptcy Code.

WHEREFORE, the Trustee requests that this Chapter 13 case be converted to a case under Chapter 7 of the Bankruptcy Code.

Date: November 8, 2016
KLB/VJC/ae

s/ Vernon J. Cahoon
Chapter 13 Staff Attorney

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WINSTON-SALEM DIVISION

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)		

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that the attached Motion was served on the following parties by mailing a copy of the same by first-class postage pre-paid mail addressed as follows:

THOMAS EDWARD COMMERFORD
JEAN COMMERFORD
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KANNAPOLIS, NC 28083

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ROBERT E PRICE, JR
ASSISTANT BANKRUPTCY ADMINISTRATOR
MIDDLE DISTRICT OF NORTH CAROLINA
101 S. EDGEWORTH STREET
GREENSBORO, NC 27401

Date: November 8, 2016
KLB/VJC/ae

s/ Vernon J. Cahoon
Chapter 13 Staff Attorney